

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

IN RE:	:	
Alice M. Kratz	:	Chapter 13
Raymond D. Kratz	:	Case No.: 21-13005-MDC
Debtor(s)	:	

---

**MOTION TO MODIFY PLAN AFTER CONFIRMATION**

Debtors, Alice & Raymond Kratz, by and through the undersigned counsel, hereby moves this Honorable Court to Modify their Chapter 13 Plan and in support thereof avers as follows:

1. Debtor filed a Chapter 13 Petition on December 21, 2022.
2. The Chapter 13 Plan was confirmed on May 19, 2022.
3. On October 20, 2022, Creditor, Rushmore Loan Management Services, LLC. who services the debtors' mortgage, filed a Motion for Relief from the Automatic Stay.
4. On December 9, 2022, Rushmore Loan Management Services, LLC. entered a Stipulation of Settlement permitting the debtor to include post-petition arrears into a Modified Chapter 13 Plan.
5. Debtors have paid \$20,639.00 to the Chapter 13 Trustee to date.
6. The Modified Chapter 13 Plan will provide for plan payments in the amount of \$2,467.00 per month for the remaining 47 months for a new base amount of \$136,588.00.
7. The debtors are aware they must remain current on all ongoing post-petition payments owed to Rushmore Loan Management Services, LLC in order to avoid any future attempts to modify to the Automatic Stay.

WHEREFORE, Debtors, by the undersigned counsel, respectfully requests this Honorable Court to enter an Order Modifying the Chapter 13 Plan in consideration of the Stipulation of Settlement of Rushmore Loan Management Services, LLC.

Dated: December 21, 2022

/s/Brad J. Sadek, Esq  
Brad J. Sadek, Esq.  
Attorney for Debtor(s)  
Sadek & Cooper Law Offices  
1500 JFK Boulevard Suite #220  
Philadelphia, PA 19102  
215-545-0008  
brad@sadeklaw.com